

# Exhibit D

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10 Attorneys for Plaintiffs

11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 MARCO ANTONIO CARRALERO;  
14 GARRISON HAM; MICHAEL  
15 SCHWARTZ; ORANGE COUNTY  
16 GUN OWNERS PAC; SAN DIEGO  
17 COUNTY GUN OWNERS PAC;  
18 CALIFORNIA GUN RIGHTS  
19 FOUNDATION; and FIREARMS  
20 POLICY COALITION, INC.

21 Plaintiffs,

22 v.

23 ROB BONTA, in his official capacity as  
24 Attorney General of California,

25 Defendant.

Case No.: 8:23-cv-01798

**DECLARATION OF GENE  
HOFFMAN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR A  
PRELIMINARY INJUNCTION**

1 I, Gene Hoffman, declare:

2 1. I am the chairman of the California Gun Rights Foundation (“CGF”), a  
3 non-profit foundation incorporated under the laws of California with a place of  
4 business in Sacramento, California. In my role as chairman, I am familiar with CGF’s  
5 purposes as an organization, CGF’s membership, and CGF’s organizational responses  
6 to California’s Senate Bill 2, signed into law on September 26, 2023.

7 2. CGF serves its members, supporters, and the public through educational,  
8 cultural, and judicial efforts to defend and advance Second Amendment and related  
9 rights. CGF has tens of thousands of members and supporters in California, including  
10 in all cities and counties that are parties to this action. CGF brings this action on behalf  
11 of its members, including Plaintiffs Carralero, Ham, and Schwartz.

12 3. CGF’s members and supporters have been adversely and directly harmed  
13 by Defendants’ threat of enforcement of the law challenged in this case.

14 4. On September 26, 2023, California Governor Gavin Newsom signed SB2  
15 into law, which bars licensed concealed carry in many public locations, including  
16 restaurants, bars, public transportation, stadiums, libraries, museums, zoos,  
17 amusement parks, medical facilities, gambling establishments, and more. SB2 also  
18 imposes a no-carry default on private businesses open to the public, barring carry there  
19 unless the business owner expressly provides otherwise.

20 5. CGF’s members will be adversely and directly harmed by Defendants’  
21 enforcement of law once SB2 takes effect on January 1, 2024. CGF has at least one  
22 member who has a CCW license and who carries firearms in and at each of the  
23 locations challenged in this Complaint, at which locations CCW licensees will be  
24 prohibited from carrying their arms by SB2 as of January 1, 2024. These CGF  
25 members would fully intend to continue to carry at the locations challenged in this  
26 Complaint after January 1, 2024, but for their reasonable fear of prosecution if they  
27 do so after January 1, 2024.

1 I declare under penalty of perjury under the laws of the United States of  
2 America and State of California that the foregoing is true and correct to the best of my  
3 knowledge.

4  
5   
6 GENE HOFFMAN